

Comments to the Federal Communications Commission in the Matter of: RM-10867 ARRL Petition, RM-10868 Radio Amateur Foundation Petition, RM-10869 Ronald Lowrance Petition, RM-10870 NCVEC Petition

GORDON WEST RADIO SCHOOL BACKGROUND:

Our organization has been teaching amateur radio classes for more than 25 years through community colleges, yacht club and RV centers, private classes, and most recently a class of 150 for the Civil Air Patrol. I am also the author of amateur radio training materials, including books, tapes, CDs, and computer theory courses. I write national magazine articles about amateur radio, and travel throughout the country promoting the amateur radio service.

I am presently working with the HandiHam organization on adaptive testing, and I have attended numerous National Conference of Volunteer Examiner meetings in Gettysburg, PA, as the VEC organizations were inaugurated many years ago. I also contribute regularly to the NCVEC when they call for question pool submissions as well as suggestions.

I am active with the American Radio Relay League instructor program, as well as ARES, serving as a District Emergency Coordinator for Orange County, California.

I am active daily on the air, but most important, my classroom instruction gives me a firsthand view of my comments about RESTRUCTURING THE AMATEUR RADIO SERVICE, PHASE 2.

RM-10867 ARRL. I am in favor of the American Radio Relay League petition for the development of an entry-level license that would lead applicants to some high-frequency CW, data, and voice privileges. Our current Technician class entry-level examination is totally out of proportion to privileges earned, and the current 511 question pool is so large that many applicants are simply memorizing the test question pool to pass the test. We need a much more basic test for the entry-level license, and a 20-question (not 25) exam from a question pool of 200 Q & A's would seem reasonable as long as the 200 question pool is carefully developed with plenty of outside comments to test the applicant on those skills they are most likely to encounter when beginning to go on the air.

I do not agree with giving the new no-code operator 100 kilohertz of voice privileges on 75 meters, 40 meters, and 15 meters. I would suggest 50 kilohertz only. On 10 meters, 28.300 to 28.500 is a good choice for the no-code newcomer.

I concur on power output limitations to stay below RF safety guidelines. We will need to study the comments from amateur radio VHF/UHF equipment manufacturers on what burden the 50-watt power output limitation might have on their mobile and base units that may exceed this level in the set high-power position.

I see a major advantage for the new no-code-test operator gaining code practice skills on the lower portions of the 80-meter, 40-meter, 15-meter, and 10-meter bands. Even though the applicant did not need to take a code test, I think we will see many newcomers attracted to the code if we give them CW privileges as recommended by the ARRL.

The League proposes a no-test upgrade for current Technician class operators to General class. I strongly disagree. Keep the current General class examination as is, causing any Technician class operator to specifically study important areas like HF operation, RF safety, data rates, band privileges, and other important HF operating topics that they were not originally tested on for the Technician class exam after March of 1987. Allowing a new Technician class operator to automatically upgrade to General class could be physically dangerous around the higher allowed RF output levels. The Technician class applicant must study the requirements for HF General class operation, and our current General class question pool is in relatively good shape to cause them to study up before they earn their new privileges.

Keeping Extra class much like it is with a 5 wpm code test seems adequate, but since many Extra class operators may become volunteer examiners, I would think a code proficiency of 13 wpm would be much more appropriate. I suggest we elevate the Extra class code test speed to 13 wpm.

RM-10868 RADIO AMATEUR FOUNDATION. This organization petitions for a 5 wpm Morse Code examination for General class and amateur Extra class. The 5 wpm code test for General class now makes sense. If the entry-level operator gets so excited about their new restricted privileges on HF, they can practice their code on HF and take a 5 wpm code test along with my recommended written General exam. However, the 5 wpm code test might be relaxed on what it might consist of. Sending code for several minutes might be a good way to test for 5 wpm skills, too.

The suggestion of a 10-day waiting period before retesting makes good sense. Most applicants who fail an examination also fail a retest at that same session.

Fifteen kilohertz digital bandwidth from 29.0 to 29.3 MHz is an interesting proposal to foster new types of data emissions. We would need to carefully study what current services on this 300 kHz of band might be disturbed by wide bandwidth data.

The RAF proposes scrapping the existing amateur radio question pools and starting over from scratch. They claim that many applicants learn memorization skills rather than the technical theory behind some of the questions. I couldn't agree more! This is why I recommend the entry-level, 200-question pool be completely worked up new, as opposed to simply refreshing it by adding some additional similar questions which we have been doing for the last 15 years.

We need to take a hard look at how our Question Pool Committee views the examination process. It makes absolutely no sense to offer amateur radio training classes when the volume of questions on a particular test simply requires teaching test-passing memory skills. Let's get back to just a few questions that would allow instructors to present training classes that would concentrate on theory, rather than simply memorizing A-B-C-D answers.

It was my recommendation to the Question Pool Committee that they appoint numerous amateur operators in specific specialty areas to develop new fresh questions from the ham community at large. The Question Pool Committee repeatedly dismisses my comments to them that they need to do a much bigger job to gain amateur radio input for new questions and topic leaders assisting the Committee in their volunteer efforts.

I absolutely agree with RAF in their statement, "...to require applicants to learn, rather than memorize, the examination material."

RM-10869 RONALD LOWRANCE. Mr. Lowrance agrees with me that 5 wpm for *General* class and 13 wpm for *Extra* class tests is appropriate.

RM-10870 NATIONAL CONFERENCE OF VOLUNTEER EXAMINER COORDINATORS. In their petition, it is noted that there is reference to the Technician entry-level examination being "overly complex." Yet it was the NCVEC's own Question Pool Committee that has continually added more and more questions to the pool, indeed making it overly complex to the new operator.

The NCVEC suggests totally eliminating CW testing. I would agree for the entry-level license with limited HF privileges, but we all might consider a 5 wpm code test for *General*, and 13 wpm for *Extra*.

I agree with the NCVEC for 50 kHz only of voice privileges on 75 meters and 40 meters, but they call for a 100 kHz of voice on the 15-meter band, and I would only recommend 50 kHz at the top of the band. For 10 meters, they call for 200 kHz of voice from 28300 to 28500 kHz, with which I agree, and I also agree with 29 MHz-29.7 MHz for all modes, too. This would allow the new operator to get a taste of the excitement of FM at the top of the 10-meter band.

I disagree on their comment that all Technician and Tech-plus operators be upgraded without examination to *General* class. Any upgrade to *General* class should include the 35-question written examination. Technician class operators without taking the examination have absolutely no clue on how to calculate RF safety, and we would be creating a liability by allowing them to go onto *General* class frequencies without testing some of their RF safety knowledge.

SUMMARY. Most important is the complete scrapping of our current Technician class examination with 511 questions in the pool, a patchwork of Q & A's that should have been tossed out years ago. It is unreasonable for the beginner operator to subject them to the ridiculous process of rote memorization of questions and answers to get through that important entry-level examination. Let's get back to a fresh, new pool developed by the outside amateur community and presented to the QPC for their consideration. Let's make sure that the QPC stays positive to all hams wishing to work with them to develop a completely brand new entry-level question pool that would incorporate questions also on their new HF privileges.

Absolutely no automatic upgrade from Technician to *General* without a written test. *General* class operators running up to 1500 watts of power need to know RF safety. They need to know band plans. They need to know data rates and bandwidth. They need to know the material found in the current *General* class question pool. No automatic upgrades to *General* class!

Each of these four petitions clearly point out the immediate need for restructuring. More important than the code or no-code issue is the development of an entry-level license with an appropriate entry-level examination. The development of the entry-level examination question pool

MUST take extra efforts by the QPC to involve ham radio operator input. We must not re-use existing exam questions that have been dredged up from the past.

Technician class ham operators throughout the country may be suspending their efforts to prepare for a *General* class test based on the uncertainty of whether they should take the exam for *General* or not. This has stalled *General* class upgrades dramatically at this time. This, in turn, has stalled upgrade classes. And even though publishers have now developed new books for the July 1, 2004, *General* class question pool, prospective students are stalling any decision to continue their studies until they learn whether or not a *General* class written examination will be required for their planned upgrade.

Thank you for considering these comments to the four petitions for rulemaking.

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